

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re: : Chapter 7  
SAMUEL DELACRUZ, :  
: Debtor, : Bankruptcy No. 23-11283 pmm

**STIPULATION EXTENDING THE TIME TO FILE A COMPLAINT UNDER  
SECTION 727 AND/OR A MOTION TO DISMISS UNDER SECTION 707**

**NOW**, this 18TH day of August, 2023, it is hereby agreed and stipulated to between Attorney for the debtor, Larry W. Miller, Jr., Esq. and Bonnie B. Finkel, the chapter 7 trustee as follows:

The parties hereby agree, that the time for the Chapter 7 Trustee and for the US Trustee to file a Complaint to Deny Discharge under Section 727 and/or a Motion to Dismiss under 707 is hereby extended an additional 60 days past the original deadline date of August 28, 2023. The Trustee had requested additional financial information including the business income, personal income, and bank statements and needs additional time to review the large volume of documentation provided in this potential asset case.

Therefore, the parties agree that the new deadline for the Trustee or U.S. Trustee to file a Complaint or a Motion to Dismiss will be October 27, 2023.

This Stipulation can be executed in counterparts and filed in counterparts so that it is as if it were one integrated document

/s/ Larry W. Miller, Jr.

Larry W. Miller, Jr., Esq.  
Attorney for Debtor

  
Bonnie B. Finkel, Esq.  
Chapter 7 Trustee

**ORDER**

**NOW, this 21<sup>st</sup> day of August, 2023, IT IS HEREBY ORDERED AND  
DECREED that the above Stipulation be approved.**



**HONORABLE PATRICIA M. MAYER**  
**United States Bankruptcy Judge**